

# BLANKROME

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December 21, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Judge  
United States District Court – S.D.N.Y.  
40 Foley Square, Room 906  
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.*,  
No. 1:15-cv-05345 (AJN) (KHP)**

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Dear Judge Nathan:

We represent Triadou SPV S.A. (“Triadou”) in the above-referenced case.

On July 1, 2020, Triadou moved for summary judgment on all remaining claims. (ECF 1282). Triadou also moved to preclude the testimony of two experts, Tarig Kozouz and Jennifer Sims Vu, offered by the City of Almaty, Kazakhstan and BTA Bank JSC (together, “Almaty/BTA”). (ECF 1274, 1277). On the same day, Almaty/BTA moved to preclude or limit the testimony of three experts offered by Triadou, Thomas Tener, Ryan C. Pisarik, and S. Ilan Guedj, which motions Triadou opposed. (ECF 1299, 1305, 1308).

Pursuant to Rule 3.E of the Court’s Individual Practices in Civil Cases and Local Civil Rule 6.1(c), Triadou submits this letter to respectfully request oral argument on all pending motions, if the Court believes that such argument would be helpful.

Thank you for your consideration.

Respectfully submitted,

s/ Deborah A. Skakel  
Deborah A. Skakel